

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS, et al.,

Plaintiffs

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action

Lead Case No.:  
3:21-CV-00259-DCG-JES-JVB

**JOINT STIPULATIONS OF FACT**

Pursuant to this Court’s March 19, 2025 Pretrial Scheduling Order (ECF No. 880), the parties in the above captioned consolidated case submit the following joint statement of facts stipulated for purposes of trial in these cases, and for no other purposes.

In stipulating to these facts, the parties do not waive their right to argue that any fact is irrelevant or entitled to little or no weight.

**I. Parties**

**A. Gonzales Plaintiffs**

1. Plaintiff Cecilia Gonzales is Hispanic. She is a registered voter and a resident of Arlington, in Tarrant County. Under Senate Bill 6, she resides in congressional district (“CD”) 25. Ms. Gonzales intends to vote in future congressional elections in CD 25, or in any other districts in which she is eligible to vote. Under the Gonzales Plaintiffs’ Demonstration Map 2, Ms. Gonzales lives in CD 33.

2. Plaintiff Agustin Loreda is Hispanic. He is a registered voter and a resident of Baytown, in Harris County. Under Senate Bill 6, he resides in CD 36. Mr. Loreda intends to vote in future congressional elections in CD 36 or in any other districts in which he is eligible to vote. Under the Gonzales Plaintiffs' Demonstration Map 2, Mr. Loreda lives in CD 38.

3. Plaintiff Jana Lynne Sanchez is Hispanic. She is a registered voter eligible to vote in Fort Worth, in Tarrant County. Under Senate Bill 6, she is eligible to vote in CD 33. Ms. Sanchez intends to vote in future congressional elections in CD 33, or in any other district in which she is eligible to vote. Under the Gonzales Plaintiffs' Demonstration Map 2, Ms. Sanchez is eligible to vote in CD 12.

4. Plaintiff Jerry Shafer is Hispanic. He is a registered voter and a resident of Baytown, in Harris County. Under Senate Bill 6, he resides in CD 36. Mr. Shafer intends to vote in future congressional elections in CD 36 or in any other district in which he is eligible to vote. Under the Gonzales Plaintiffs' Demonstration Map 2, Mr. Shafer lives in CD 38.

5. Plaintiff Debbie Lynn Solis is Hispanic. She is a registered voter and a resident of Dallas, in Dallas County. Under Senate Bill 6, she resides in CD 33. Ms. Solis intends to vote in future congressional elections in CD 33, or in any other district in which she is eligible to vote. Under the Gonzales Plaintiffs' Demonstration Map 2, Ms. Solis lives in CD 12.

#### **B. Texas NAACP Plaintiffs**

6. Plaintiff Texas State Conference of the NAACP ("Texas NAACP") is a subsidiary organization of the National Association for the Advancement of Colored People, Inc. ("NAACP"), a national non-profit, non-partisan organization founded in 1909.

7. The first Texas branches of the NAACP were formed in 1915, and the Texas State Conference was formally organized in 1937.

8. The Texas NAACP is headquartered in Austin and has more than 100 local branch units, college chapters, and youth councils across the State, with members in many counties throughout Texas.

9. The Texas NAACP has numerous—often hundreds—of members in each district challenged.

### **C. Brooks Plaintiffs**

10. Plaintiff Roy Charles Brooks is a Black citizen and registered voter in Tarrant County, TX. He resides and votes in SD 10 under the Texas Senate Plan S2168. Plaintiff Brooks has voted in past elections including in 2022 and 2024<sup>4</sup> and plans to vote in future elections.

11. Plaintiff Felipe Gutierrez is a Latino citizen and registered voter in Tarrant County, Tx. He currently resides and votes in SD 9 under the Texas Senate Plan S2168. Under Plan S2134, Mr. Gutierrez would reside in SD 10. Mr. Guterrez intends to vote in future elections in SD 9, and in other elections in which he is eligible to vote.

12. Plaintiff Phyllis Goines is a Black citizen and registered voter in Tarrant County, TX. She resides in SD9 and in CD33. Under Plans C2163 and C2167, Ms. Goines would reside in CD33, and under Plan S2134 she would reside in SD 10. She intends to vote in future elections in SD 9 and CD 33 and in other elections in which she eligible to vote.

13. Plaintiff Eva Bonilla is a Latina citizen and registered voter in Tarrant County, TX. She resides in SD9 and CD12. Under Plan S2134 Ms. Bonilla would reside in SD10. Ms. Bonilla intends to vote in future elections in SD 9, and in other elections in which she is eligible to vote.

14. Plaintiff Clara Faulkner is a Black citizen and registered voter in Tarrant County, TX. She resides in SD10 and in CD33. Under Plans C2163 and C2167, Ms. Faulkner would reside in CD33, and under Plan S2134 Ms. Faulkner would reside in SD10. Ms. Faulkner intends to vote in future elections in SD 10 and CD 33, and in other elections in which she is eligible to vote.

15. Plaintiff Deborah Spell is a Black citizen and registered voter in Tarrant County, TX. She resides in SD 22. Under Plan S2134, Plaintiff Spell would reside in SD 10. Ms. Spell intends to vote in future elections in SD 22, and in other elections in which she is eligible to vote.

16. Plaintiff Sandra M. Puente is a Latina citizen and is registered to vote. She resides in CD 29. Under Plans C2163 and C2167, Ms. Puente would reside in a majority Hispanic CVAP district, CD 29. Ms. Puente intends to vote in future elections in CD 29, and in other elections in which she is eligible to vote.

17. Plaintiff Jose R. Reyes is a Latino citizen and is registered to vote. He resides in CD 29. Under Plans C2163 and C2167 Mr. Reyes would reside in a majority Hispanic CVAP district, CD 29. Mr. Reyes intends to vote in future elections in CD 29, and in other elections in which he is eligible to vote.

18. Plaintiff Norma Cavazos is a Latina citizen and is registered to vote. She resides in HD118 in Plan H2316. Under Plan H2156, Ms. Cavazos would reside in HD 118. Ms. Cavazos intends to vote in future elections in HD 118, and in other elections in which she is eligible to vote.

19. Plaintiff Lydia Alcalan is a Latina citizen and is registered to vote. She resides in CD 30 in Plan C2193. Under Plan C2163, Plaintiff Alcalan would reside in CD37, a district that is majority Latino CVAP. Under Plan C2167, Plaintiff Alcalan would reside in CD6. Ms. Alcalan intends to vote in future elections in CD 30, and in other elections in which she is eligible to vote.

20. Plaintiff Martin Saenz is a Latino citizen and is registered to vote. He resides in CD 5 in Plan C2193. Under Plan C2163, Mr. Saenz would reside in CD 32. Mr. Saenz intends to vote in future elections in CD 5, and in other elections in which she is eligible to vote.

#### **D. Defendants**

21. Jane Nelson is the Secretary of State of Texas. As Secretary of State, Ms. Nelson serves as Texas’s Chief Election Officer. Tex. Elec. Code § 31.001(a). As “the chief election officer of the state,” *id.*, Ms. Nelson is required to “obtain and maintain uniformity in the application, operation, and interpretation of” Texas’s election laws, including by issuing directives and instructions to all state and local authorities having duties in the administration of these laws, *id.* § 31.003. Ms. Nelson is empowered to order any official to correct conduct that “impedes the free exercise of a citizen’s voting rights.” *Id.* § 31.005(b). Ms. Nelson prescribes the form that individuals must complete for a place on a political party’s general primary ballot, *see id.* §§ 141.031, 172.021-.024. Political parties who wish to hold a primary must deliver written notice to the Secretary of State noting their intent to hold a primary election, *id.* § 172.002, and the party chairs must certify to the Secretary of State the name of each candidate who has qualified for placement on the general primary election ballot, *id.* § 172.028. The Secretary of State also serves as the filing authority for independent candidates for federal office, including members of Congress. *See id.* § 142.005. The adopted redistricting plans are filed with the Secretary of State to ensure that elections are conducted in accordance with those plans.

22. Gregory Wayne Abbott is the Governor of the State of Texas. Under Texas’s election laws, Governor Abbott “shall order . . . each general election for . . . members of the United States Congress” by proclamation. Tex. Elec. Code § 3.003.

#### **II. The 2020 Census and Texas Demographics**

23. On April 26, 2021, the U.S. Census Bureau announced that based on the 2020 decennial census, Texas would gain two additional seats in the United States House of Representatives.

24. On August 12, 2021, the Census Bureau released the detailed population and demographic data needed to draw new congressional districts under Public Law 94-171.

25. On September 16, 2021, the Census Bureau released its full redistricting toolkit.

26. According to the 2020 U.S. Census, Texas's population was 29,145,505 in 2020.

27. According to the 2020 U.S. Census, 39.8% of Texans were non-Hispanic White, 39.3% of Texans were Hispanic, 5.99% of Texans were Asian (or AAPI), and 13.6% of Texans were Black (including multi-racial Texans who identified as partially Black).

28. According to the U.S. Census, Texas's overall population increased by 3,999,944 people between 2010 and 2020. Hispanics accounted for 49.5% of that growth. The non-Hispanic White population accounted for 4.7% of that growth.

29. According to five-year estimates from the 2016-2020 American Community Survey data, the citizen voting age population (CVAP) of Texas was 18,578,830 in 2020. Of that population, 50.8% was non-Hispanic White, 30.5% was Hispanic, 4.22% was Asian (or AAPI), and 13.5% was Black (including multi-racial Texans who identified as partially Black).

30. According to American Community Survey data, Texas's CVAP grew by 3,301,865 between 2010 and 2020. Hispanics accounted for 54% of that growth. Non-Hispanic Whites accounted for 18.4% of that growth.

31. Approximately 19% of the CVAP population growth in Fort Bend County came from Black voters.

32. Approximately 25% of the population growth in Brazoria County came from Black voters.

### **III. The 2020 Redistricting Process**

#### **A. Membership of the Redistricting Committees**

33. In 2019, the Committee on Redistricting of the Texas House of Representatives included the following members: Representatives Phil King (Chair), Chris Turner (Vice Chair), Sheryl Cole, Matt Kruase, Lyle Larson, Jeff Leach, Ben Leman, Ina Minjarez, Joe Moody, Chris Paddie, Four Price, Toni Rose, Senfronia Thompson, Armando Walle, and James White.

34. In 2021, the Committee on Redistricting of the Texas House of Representatives included the following members: Todd Hunter (Chair), Toni Rose (Vice Chair), Rafael Anchia, Craig Goldman, Ryan Guillen, Jacey Jetton, Brooks Landgraf, Ina Minjarez, Joe Moody, Geanie Morrison, Andrew Murr, Mike Schofield, Senfronia Thompson, and Chris Turner.

35. Of those members, Representative Todd Hunter was a member of the 2011 Texas House Redistricting Committee, and Representatives Toni Rose, Ina Minjarez, Senfronia Thompson, and Chris Turner were members of the 2019 Texas House Redistricting Committee.

36. In 2019, the Senate Committee on Redistricting included the following members: Senators Joan Huffman (Chair), Juan Hinojosa (Vice Chair), Carol Alvarado, Paul Bettencourt, Brian Birdwell, Dawn Buckingham, Donna Campbell, Pat Fallon, Peter P. Flores, Kelly Hancock, Bryan Hughes, Eddie Lucio, Jr., Jose Menedez, Robert Nichols, Angela Paxton, Charles Perry, Kirk Watson, Royce West, and John Whitmire.

37. Of these members, Senators Joan Huffman, Eddie Lucio, Jr., and Royce West had also been members of the 2011 Senate Redistricting Committee.

38. In 2021, the Texas Senate Committee on Redistricting included the following members: Senators Joan Huffman, Juan Hinojosa, Carol Alvarado, Paul Bettencourt, Brian Birdwell, Donna Campbell, Kelly Hancock, Bryan Hughes, Eddie Lucio, Jr., Robert Nichols, Angela Paxton, Charles Perry, Royce West, John Whitmire, and Judith Zaffirini.

39. Of these members, Senators Joan Huffman, Paul Bettencourt, Brian Birdwell, Donna Campbell, Kelly Hancock, Bryan Hughes, Eddie Lucio, Jr., Robert Nichols, Angela Paxton, Charles Perry, Royce West, and John Whitmire had been members of the Senate Committee on Redistricting in 2011, in 2019, or both.

## **B. The Redistricting Process**

### **1. Hearings**

40. On October 22, 2019, the Texas House Committee on Redistricting held a public hearing in Dallas, Texas related to redistricting, at which Chair Representative Phil King gave remarks and Dr. Lila Valencia from the State Demographer's office gave a presentation.

41. Dr. Valencia's presentation included population projections and growth figures broken down by race and ethnicity.

42. On October 29, 2019, the Senate Committee on Redistricting held a hearing at which Dr. Lloyd Potter from the State Demographer's office gave a presentation.

43. Dr. Potter's presentation included racial and ethnic breakdowns of Texas's population growth and shaded maps showing the location and density of Black Texans in the Dallas–Fort Worth and Houston areas.

44. From January to March 2021, the Senate Special Committee on Redistricting, led by Republican Senator Joan Huffman, heard public testimony during a series of hearings with a regional focus. Each hearing was held over the Zoom two-way video conferencing platform

45. The Texas House Committee on Redistricting also held a series of virtual hearings for the purpose of considering public testimony on the redistricting process.

46. On March 13, 2021, the Senate Committee on Redistricting held another hearing at which Dr. Lloyd Potter from the State Demographer's office gave another presentation.



47. Dr. Potter's presentation included information on population change by race and ethnicity in each Texas county.

48. As part of this presentation, Dr. Potter provided a map which showed the 2010 to 2020 changes in population, both in terms of total numbers and percentage changes.

49. On September 7, 2021, Governor Abbott issued a proclamation which announced a third special session to commence on September 20, 2021, for the purpose of considering "[l]egislation relating to the apportionment of the State of Texas into districts used to elect members of the Texas House of Representatives, the Texas Senate, the State Board of Education, and the United States House of Representatives."

50. On September 13, 2021, the Texas House Committee on Redistricting held another hearing at which Dr. Lloyd Potter from the State Demographer's office gave another presentation.

51. Dr. Potter's presentation included a color-coded map identifying which counties lost non-Hispanic White population.

## **2. The Congressional Plan**

52. Senator Joan Huffman released Plan C2101, filed Senate Bill 6 on September 27, 2021, and scheduled the bill for a public hearing on September 30, 2021.

53. Plan C2101 was identical to a plan submitted to the Senate Special Redistricting Committee by Chris Gober, a lawyer hired by Texas's Republican Congressional delegation.

54. Mr. Gober contracted with Adam Kincaid and the National Republican Redistricting Trust to assist with drawing proposed maps, including the plan that became C2101.

55. On September 30, 2021, Senate Bill 6 was considered by the Special Committee on Redistricting. The Committee considered invited and in-person public testimony.

56. The Senate Special Committee on Redistricting met to consider Senate Bill 6 on October 4, 2021, and reported it favorably substituted.

57. The full Senate considered Senate Bill 6 on October 8, 2021.

58. After a floor debate, Senate Bill 6 was amended in accordance with Floor Amendments 1 and 2 and passed the Senate with 18 “yeas” and 13 “nays” on that day.

59. The Texas House received Senate Bill 6 from the Senate on October 8, 2021

60. On October 13, 2021, the House Committee on Redistricting held a public hearing on Senate Bill 6.

61. At the October 13, 2021, hearing on Senate Bill 6 Chairman Hunter said he intended to vote the bill out at the end of the hearing.

62. On Saturday, October 16, 2021, the full House considered Senate Bill 6 and proposed amendments.

63. On Sunday, October 17, 2021, the House then voted 79 to 56 to pass Senate Bill 6 as amended, with one member “present and not voting.”

64. Later on October 17, 2021, the Senate did not concur in the House amendments to Senate Bill 6 and a conference committee was appointed, consisting of Senators Huffman, Nelson, Nichols, Campbell, and Perry, and Representatives Hunter, Jetton, Landgraf, Lozano, and Senfronia Thompson.

65. The conference committee filed a report that same day. Representative Senfronia Thompson, the only Black and only Democratic member of the conference committee, did not sign the conference committee report.

66. On October 18, 2021, both the House and Senate passed the conference committee report, sending Senate Bill 6 to the Governor.

67. Governor Abbott signed Senate Bill 6 on October 25, 2021.

### **3. The Senate Plan**

68. Senator Joan Huffman filed Senate Bill 4 (“SB 4”), containing Senate Plan 2168 for the Texas State Senate, on September 18, 2021.

69. On September 20, 2021, the Senate Committee on Redistricting issued a hearing notice for SB 4, setting a hearing on the bill for September 24, 2021.

70. On September 24 and 25, 2021, the Senate Committee on Redistricting held public hearings on SB 4.

71. The Senate Committee on Redistricting voted out the bill on September 28, 2021.

72. On October 4, 2021, the Senate suspended the printing rule and passed SB 4 on the third reading.

73. The House Committee on Redistricting held an October 11, 2021 hearing on SB 4.

74. On October 15, 2021, the House passed SB 4.

75. Governor Abbott Signed SB 4 into law on October 21, 2021.

### **4. The House Plan**

76. On September 30, 2021, Representative Todd Hunter, chair of the House Redistricting Committee, filed House Bill 1 (“HB 1”)—containing House Plan 2316 (“H2316”), the redistricting plan for the Texas state house.

77. Adam Foltz assisted in the drawing of HB 1.

78. The first public hearing on HB 1 was held on October 4, 2021.

79. The House Committee on Redistricting held another hearing on HB 1 on October 5, 2021, and voted out a committee substitute of HB 1.

80. On October 13, 2021, the House passed HB 1.

81. On October 15, 2021, the Senate Special Committee on Redistricting held a public hearing on HB 1. The Senate committee voted out the bill at the end of the hearing.

82. The full Senate then suspended a rule for the regular order of business, voting out HB 1 on October 15, 2021.

83. HB 1 was then sent to Governor Abbott's on the same day, October 15, 2021.

84. On October 25, 2021, Governor Abbott signed HB 1 into law.

#### **IV. The Enacted Congressional Plan**

85. The congressional districts in the Enacted Congressional Map (SB 6) contain equal population.

86. The congressional districts in the Enacted Map are contiguous.

87. There are eight CDs wholly or partly in Dallas and Tarrant Counties under the Enacted Map. These are CDs 5, 6, 12, 24, 25, 30, 32, and 33.

88. There are nine CDs wholly or partly in Harris County under the Enacted Map. These are CDs 2, 7, 8, 9, 18, 22, 29, 36, and 38. A tenth CD, CD-14, is just south of Harris County.

#### **V. Texas Legislature 2023 Ratification of the 2021 State Legislative Maps**

89. In 2023, the Texas Legislature—to comply with a technical requirement of the Texas Constitution that redistricting occur in the first *regular* session following receipt of the Census data—passed HB 1000 (state house) and SB 375 (state senate) through which the Legislature “ratified” the maps enacted in 2021. H.1000 provides:

The districts used to elect members of the Texas House of Representatives in 2022, established by Chapter 1 (H.B. 1), Acts of the 87th Legislature, 3rd Called Session, 2021 (PLANH2316 in the Texas Legislature's redistricting system), are hereby ratified and adopted as the districts used to elect members of the Texas House of Representatives.<sup>1</sup>

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<sup>1</sup>H.B. 1000, 88th Reg. Sess., available at <https://capitol.texas.gov/tlodocs/88R/billtext/pdf/HB01000F.pdf#navpanes=0>.

And SB 375 provides:

The districts used to elect members of the Texas Senate in 2022, established by Chapter 5 (S.B. 4), Acts of the 87th Legislature, 3rd Called Session, 2021 (PLANS2168 in the Texas Legislature's redistricting system), are hereby ratified and adopted as the permanent districts used to elect members of the Texas Senate.<sup>2</sup>

90. HB 1000 and SB 375 provide that the 2021 redistricting plans for state house and senate are “ratified and adopted as the permanent districts” for the state legislature.

91. Both HB 1000 and SB 375 identify the Bill Numbers that adopted the maps in 2021 (HB 1 and SB 4) as well as the Texas Legislature’s redistricting system Plan numbers for both ratified maps (Plan H2316 and Plan S2168). S.B. 375 reiterates that the districts “are a continuation of the districts used for the election of members of the Senate of the 88th Legislature.”

#### **VI. Gonzales Plaintiffs’ Demonstration Map 2**

92. The congressional districts in Gonzales Plaintiffs’ Demonstration Map 2 (“DM2”) contain equal population.

93. The congressional districts in DM2 are contiguous.

94. There are eight CDs wholly or partly in Dallas and Tarrant Counties under DM2. These are CDs 5, 6, 12, 24, 25, 30, 32, and 33.

95. There are nine CDs wholly or partly in Harris County under DM2. These are CDs 2, 7, 8, 9, 18, 22, 29, 36, and 38. A tenth CD, CD 14, is just south of Harris County.

#### **VII. Brooks Plaintiffs’ Demonstrative Maps**

96. The congressional districts in the Brooks Plaintiffs’ Demonstrative Map, Plan C2163 contains equal population.

97. The congressional districts in Plan C2163 are contiguous.

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<sup>2</sup> S.B. 375, 88th Reg. Sess., available at: <https://capitol.texas.gov/tlodocs/88R/billtext/pdf/SB00375F.pdf#navpanes=0>.

98. The congressional districts in the Brooks Plaintiffs' Demonstrative Map, Plan C2167 contains equal population.

99. The congressional districts in Plan C2167 are contiguous.

100. The Texas House districts in the Brooks Plaintiffs' Demonstrative Map, Plan H2176 are within population deviation.

101. The Texas House districts in Plan H2176 are contiguous.

102. The Texas Senate districts in Plan S2134 are within population deviation.

103. The Texas Senate districts in Plan S2134 are contiguous.

Dated: March 14, 2025

Respectfully submitted,

**For LULAC Plaintiffs:**

/s/ Nina Perales

Nina Perales

Julia Longoria

Sabrina Rodriguez

Mexican American Legal Defense and Educational  
Fund (MALDEF)

110 Broadway Street, Suite 300

San Antonio, TX 78205

(210) 224-5476

(210) 224-5382

[nperales@maldef.org](mailto:nperales@maldef.org)

[jlongoria@maldef.org](mailto:jlongoria@maldef.org)

[srodriguez@maldef.org](mailto:srodriguez@maldef.org)

Ernest I. Herrera

Mexican American Legal Defense and Educational  
Fund (MALDEF)

634 S. Spring Street, 9<sup>th</sup> Floor

Los Angeles, CA 90014

(210) 629-2512

[eherrera@maldef.org](mailto:eherrera@maldef.org)

Andrea E. Senteno\*

Mexican American Legal Defense and Educational  
Fund (MALDEF)

1016 16<sup>th</sup> Street, Suite 100

Washington, DC 20036

**For Gonzales Plaintiffs:**

/s/ David R. Fox

David R. Fox\*

Richard A. Medina\*

Elias Law Group LLP

250 Massachusetts Ave. NW, Suite 400

Washington, D.C. 20001

Telephone: (202) 968-4490

[dfox@elias.law](mailto:dfox@elias.law)

[rmedina@elias.law](mailto:rmedina@elias.law)

Abha Khanna\*

Elias Law Group LLP

1700 Seventh Ave, Suite 2100

Seattle, WA 98101

Telephone: (206) 656-0177

[akhanna@elias.law](mailto:akhanna@elias.law)

Renea Hicks

Attorney at Law

Texas Bar No. 09580400

Law Office of Max Renea Hicks

P.O. Box 303187

Austin, Texas 78703-0504

(512) 480-8231

[rhicks@renea-hicks.com](mailto:rhicks@renea-hicks.com)

(202) 293-2828

Asenteno@maldef.org

Khrystan N. Policarpio\*

Mexican American Legal Defense and Educational  
Fund (MALDEF)

1512 14<sup>th</sup> Street

Sacramento, CA 95814

(916) 444-3031

kpolicarpio@maldef.org

**For MALC Plaintiffs:**

/s/ Sean J. McCaffity

George (Tex) Quesada

State Bar No. 16427750

Email: [quesada@texttrial.com](mailto:quesada@texttrial.com)

Sean J. McCaffity

State Bar No. 24013122

Email: [smccaffity@texttrial.com](mailto:smccaffity@texttrial.com)

3811 Turtle Creek Boulevard, Suite 1400

Dallas, Texas 75219-4461

214/720-0720 (Telephone)

214/720-0184 (Facsimile)

Joaquin Gonzalez

Texas Bar No. 24109935

1055 Sutton Dr.

San Antonio, TX 78228

[jgonzalez@malc.org](mailto:jgonzalez@malc.org)

**For Plaintiff Texas NAACP:**

/s/ Lindsey B. Cohan

Lindsey B. Cohan

Dechert LLP

515 Congress Avenue, Suite 1400

Austin, TX 78701

(512) 394-3000

[lindsey.cohan@dechert.com](mailto:lindsey.cohan@dechert.com)

**For Brooks Plaintiffs:**

/s/ Chad W. Dunn

Chad W. Dunn (Tex. Bar No.

24036507)

Brazil & Dunn

4407 Bee Caves Road

Building 1, Ste. 111

Austin, TX 78746

(512) 717-9822

[chad@brazilanddunn.com](mailto:chad@brazilanddunn.com)

/s/ Mark P. Gaber

Mark P. Gaber\*

Mark P. Gaber PLLC

P.O. Box 34481

Washington, DC 20043

(715) 482-4066

[mark@markgaber.com](mailto:mark@markgaber.com)

Jesse Gaines\* (Tex. Bar. No. 07570800)

P.O. Box 50093

Fort Worth, TX 76105

817-714-9988

[gainesjesse@ymail.com](mailto:gainesjesse@ymail.com)

Molly E. Danahy\*

P.O. Box 51

Helena, MT 59624

(406) 616-3058

[danahy.molly@gmail.com](mailto:danahy.molly@gmail.com)

Sonni Waknin\*

10300 Venice Blvd. # 204

Culver City, CA 90232

732-610-1283

[sonniwaknin@gmail.com](mailto:sonniwaknin@gmail.com)

**For Plaintiff-Intervenors:**

/s/ Gary Bledsoe

Gary Bledsoe

The Bledsoe Law Firm PLLC

6633 Highway 290 East #208

Austin, TX 78723

(512) 322-992

[gbledsoe@thebledsoelawfirm.com](mailto:gbledsoe@thebledsoelawfirm.com)

\*Admitted *pro hac vice*

**For State Defendants:**

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

RALPH MOLINA  
Deputy First Assistant Attorney General

RYAN D. WALTERS  
Deputy Attorney General for Legal Strategy

/s/ Ryan G. Kercher  
RYAN G. KERCHER  
Chief, Special Litigation Division  
Texas Bar No. 24060998  
ryan.kercher@oag.texas.gov

KATHLEEN T. HUNKER  
Deputy Chief, Special Litigation Division  
Texas Bar No. 24118415  
kathleen.hunker@oag.texas.gov

WILLIAM D. WASSDORF  
Deputy Chief, General Litigation Division  
Texas Bar No. 24103022  
william.wassdorf@oag.texas.gov

DAVID BRYANT  
Senior Special Counsel  
Texas Bar No. 03281500  
david.bryant@oag.texas.gov

ZACHARY L. RHINES  
Special Counsel  
Texas Bar No. 24116957  
zachary.rhines@oag.texas.gov

MUNERA AL-FUHAID  
Special Counsel  
Texas Bar No. 24094501  
munera.al-fuhaid@oag.texas.gov

ZACHARY W. BERG  
Special Counsel  
Texas Bar No. 24107706  
zachary.berg@oag.texas.gov

ALI M. THORBURN  
Assistant Attorney General  
Texas Bar No. 24125064  
ali.thorburn@oag.texas.gov

KYLE S. TEBO  
Special Counsel  
Texas Bar No. 24137691  
kyle.tebo@oag.texas.gov

MARK A. CSOROS  
Assistant Attorney General  
Texas Bar No. 24142814  
mark.csoros@oag.texas.gov

OFFICE OF THE ATTORNEY GENERAL OF TEXAS  
Special Litigation Division  
P.O. Box 12548 (MC-009)  
Austin, Texas 78711-2548  
Phone: (512) 936-1700  
Fax: (512) 457-4410



**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on May 14, 2025, and that all counsel of record were served by CM/ECF.

/s/ David R. Fox